

From: [Mark Nanavati](#)
To: [Rodgers, James](#); [James Chapman](#)
Cc: [Mackenzie Pensyl](#); [W. Ryan Snow](#); [Zach Jett](#); [Murphy, Siobhan](#); [Johnson, Dawn](#); [Werner, Rachel](#); [Roman, Michael](#)
Subject: RE: [External] In re Coeyman Marine Towing, et al, USDC, EDVA; Meet and Confer of July 21, 2025 [CC-US.980000.981028.FID1207794]
Date: Tuesday, July 22, 2025 9:08:15 AM
Attachments: [image001.png](#)

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Jim – responses in red.

At today's Meet and Confer we discussed, *inter alia*, Belt Line's notice for deposition of Josef Malik, Esq. Rather than produce Mr. Malik next week as we had anticipated, we prefer to await the Court's guidance vis-à-vis Carver's Motion for Protective Order, which we intend to file shortly. As we discussed, there is a disagreement between the parties as to the scope of Mr. Malik's deposition. We are contacting you tonight to avoid any undue reliance on our earlier representation of today's date.

Confirming Carver will not produce Malik despite our discussions yesterday. Sounds like we will have to agree to disagree on Malik.

We also understand that you will get back to us tomorrow on whether Belt Line will continue to pursue the deposition of Jason Galioto following your receipt of Mr. Galioto's affidavit.

We want to take Galioto's deposition by zoom. As we discussed, based on Carver's representations, we expect it will be short.

In addition, this confirms that at the Meet & Confer we asked Belt Line to withdraw its Motion to Dismiss the Limitation based on Carver's 30(b)(6) witness, as well as objections of mine at several depositions. We confirm herein that you declined to withdraw same.

Correct

Likewise, we requested today that Belt Line withdraw its Motion to Compel the inspection of the tug. We confirm herein that you declined to withdraw same.

What we actually said was we would put the motion in abeyance once scheduled and withdraw it once it takes place. We sent three dates. No response.

Finally, as to Mr. Malik's deposition as set forth above, we requested today that you withdraw your positions as stated in your letter of July 17, 2025. We confirm herein that you declined to withdraw same.

Confirming Carver will not produce Malik despite our discussions yesterday. Sounds like we will have to agree to disagree on Malik.



We continue to work at scheduling Mr. Warlordy and Mr. O'Rourke for depositions as well as an inspection of the tug. This also confirms that we have agreed on a new date of August 13th for the Zoom depositions of Captain Lewis and Mr. Furborough.

We understand you were looking at 8/14 for Warlordy and O'Rourke.

Thanks,

Mark

Mark C. Nanavati
(804) 893-3866

From: Rodgers, James <James.Rodgers@clydeco.us>
Sent: Monday, July 21, 2025 10:18 PM
To: James Chapman <jchapman@cwm-law.com>; Mark Nanavati <mnnavati@snllaw.com>
Cc: Mackenzie Pensyl <mpensyl@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; Zach Jett <zjett@butler.legal>; Murphy, Siobhan <Siobhan.Murphy@clydeco.us>; Johnson, Dawn <Dawn.Johnson@clydeco.us>; Werner, Rachel <Rachel.Werner@clydeco.us>; Roman, Michael <Michael.Roman@clydeco.us>; Rodgers, James <James.Rodgers@clydeco.us>
Subject: In re Coeyman Marine Towing, et al, USDC, EDVA; Meet and Confer of July 21, 2025 [CC-US.980000.981028.FID1207794]

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Please call me directly at 212-702-6771 if you have any questions or need clarification.

Yours, etc,
Jim

James Rodgers
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